



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504 • (206) 459-6000

M E M O R A N D U M

November 29, 1982

TO: Tom Cook, Hazardous Waste Section

FROM: Tim L. Nord, Industrial Section *Tim L. Nord*

SUBJECT: RCRA/Chapter 173-303 WAC Compliance Inspection at Scott Paper, Everett

This memorandum and attached information documents a RCRA/chapter 173-303 WAC compliance inspection conducted at Scott Paper, Everett. The inspection took place on November 17, 1982 with Bruce Johnson and me acting as department representatives. We were also accompanied by Mr. Dan Freedman of the EPA. (b) (6) Manager of Environmental Resources of Scott Paper was our contact. The intent of this inspection was to: document Scott's level of involvement with Federal RCRA regulations; discuss Washington state's dangerous waste regulations; and note their compliance with these regulations.

Scott Paper originally notified the EPA of their existence as a hazardous waste management facility on November 14, 1980. Their EPA/State identification number is WAD 009250820. On March 10, 1982 Washington state promulgated chapter 173-303 WAC, Dangerous Waste Regulations. This regulation required facilities that manage state-designated wastes to amend their existing Federal Part A Application or submit a state Part A Application to include the state-designated wastes, to the department, by August 9, 1982. Scott Paper submitted a state Part A Application, which included the state-designated wastes, on August 9, 1982.

However, this application notes many wastes on Form 3, Section IV, "Descriptions of Dangerous Wastes", that have no annual quantities (attachment 1). These wastes are primarily those that are listed under appendix 9903, Discarded Chemical Products List. Mr. (b) (6) stated these substances are used as raw products or are laboratory chemicals and there is little likelihood they would be wasted, but they were listed to error on the side of overnotification.

I stated to Mr. (b) (6) that many of those wastes are also listed in appendix 9904, Dangerous Waste Source List, and since there is a possibility of many generation points, they should be designated under this general grouping. Furthermore, 173-303 WAC has quantity exclusion limits which state amounts a waste, albeit an EHW or DW, will be regulated. A zero quantity is not regulated.

USEPA SF



1560759



Mr. (b) (6) and I reviewed the wastes, their sources, assigned dangerous waste numbers and generation amounts to develop a more comprehensive list that will be put on Form 3, Section IV, of their amended Part A Application that will soon be submitted to the department. Tentatively, it will read as follows:

<u>Dangerous Waste No.</u>	<u>Estimated Annual Quantity of Waste</u>
U151	185 pounds
U228	220 gallons
F001	400 pounds*
F003	400 pounds*
F005	400 pounds*
WT01	4,800 pounds

\*Exact amounts will be stated on amended Part A Application.

A description and the handling procedure for each of the above is stated below:

U151 Mercuric chloride

This is a mercury based solution which is used as a laboratory chemical to test the efficiency of the washers which remove liquor from pulp. Approximately, three carboys having a five gallon capacity each are generated per year. These are then packed in a 55 gallon drum and shipped to Arlington, Oregon for disposal.

U228 Trichloroethylene

This chemical is used to pressure test the chlorine transfer line which runs from the marine dock to the plant site. In the past it has been shipped to VWR for recycling but if it is too contaminated disposal at Arlington, Oregon will take place.

F001 The following spent halogenated solvent used in degreasing: Brulins.

This solvent is used by plant electricians to degrease electrical components. Currently it is mixed with waste oil and burned in the hog fuel boiler. It is listed for these reasons: (1) In case of breakdown which would result in a need for disposal; (2) If future regulations prohibit the burning of these wastes in hog fuel boilers.

F003 The following spent nonhalogenated solvents: Red Band, Shell Sol 71, xylene, ethyl acetate, ethyl ether, methanol, and acetone.

These solvents are used in general plant operations and laboratory use. They are currently burned in the hog fuel boiler and are listed for the same reason as F001.



November 29, 1982

Page 3

F005 The following spent nonhalogenated solvents: Toluene and methyl ethyl ketone.

These solvents are used in general plant operations and laboratory use. Like F001 and F003, these are burned in the hog fuel boiler and listed for the same reasons.

WT01 Urea Formaldehyde Resin Sludge

This waste is made up of solids that settle out in a storage tank containing a resin mixture (urea formaldehyde) used in the tissue mill. The storage tank has the capability of holding approximately 1000 gallons of this sludge. The waste may possible be recycled by Chemical Processors and if this is not possible, disposal at Arlington, Oregon will take place.

One waste that will be deleted from Scott's Part A Application is boiler ash (D.W. NO. WT02). This waste was originally listed because Scott had been burning used tires in their hog fuel boiler which resulted in a high zinc concentration in the ash. This waste had been disposed of by landfill, on Scott property, but this practice and the burning of tires, was terminated prior to August 9, 1982. Therefore, the waste and the disposal site are not regulated under 173-303 WAC. The "clean" boiler ash is currently going to the chipmill for fill and is used for road building purposes.

However, as a disposal method, Scott is burning their primary and secondary clarifier sludge in their hog fuel boiler. These wastes have a high water content which results in inefficient burning in the boiler. This coupled with supply and quality problems of hog fuel, has brought up the question of burning used tires as a fuel source again. This is currently in the formative stage and discussion with department personnel will take place in the near future.

As required under the Federal RCRA regulations and 173-303 WAC, a hazardous waste management facility, such as Scott Paper, must develop and maintain certain records and plans. A cursory review of these items indicated they were complete and in good order. A checklist documenting this is attached.

TLN:lc

Attachments

cc: Dick Burkhalter, Industrial Section  
Roger Stanley, Industrial Section✓  
Bruce Johnson, Industrial Section  
Mr. (b) (6) Scott Paper Co., Everett  
Dan Freedman, EPA



ADER (enter from page 1)

009250820

DESCRIPTION OF DANGEROUS WASTES (continued)

LINE NO.	A. DANGEROUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in (X1))
1	U	0	1	9	0	P	S	0	1		
2	P	0	1	8	0	P	S	0	1		
3	U	0	3	7	0	P	S	0	1		
4	U	0	4	4	0	P	S	0	1		
5	U	1	2	2	0	P	S	0	1		
6	U	1	5	1	185	P	S	0	1		
7	D	0	0	9			S	0	1		INCLUDED WITH ABOVE
8	U	1	6	5	0	P	S	0	1		
9	U	2	3	9	0	P	S	0	1		
10	U	1	1	2	0	P	S	0	1		
11	U	1	1	7	0	P	S	0	1		
12	U	1	2	3	0	P	S	0	1		
13	F	0	0	1	5,400	P	S	0	1		
14	U	2	2	8			S	0	1		INCLUDED WITH ABOVE
15	D	0	0	1			S	0	1		INCLUDED WITH ABOVE
16	F	0	0	5	12,750	P	S	0	1		
17	U	2	2	0			S	0	1		INCLUDED WITH ABOVE
18	U	0	0	2			S	0	1		INCLUDED WITH ABOVE
19	U	1	5	4			S	0	1		INCLUDED WITH ABOVE
20	U	1	5	9			S	0	1		INCLUDED WITH ABOVE
21	D	0	0	2	0	P	S	0	1		
22	D	0	0	3	0	P	S	0	1		
23	W	T	0	1	4,800	P	S	0	2		
24	W	T	0	2	3,500	T	D	8	0		
25											
26											



RCRA/WAC 173-303 DANGEROUS WASTE  
COMPLIANCE CHECKLIST/QUESTIONNAIRE

Industry name and address:

Date: November 17, 1982

Scott Paper Company

2600 Federal Ave

Everett, Washington

EPA/State Identification Number:

WAD 009250820

County: Snohomish Zip: 98201

Telephone: (206) 254-7393

Physical Location of Facility (if different than above): \_\_\_\_\_

Facility Contact(s) Present During Inspection		
Name	Title	Phone No.
<u>Timothy Bechtel</u>	<u>MR Env Resources</u>	<u>254-7393</u>

Inspected by:

Tim L. Noel, Bruce Johnson WDOE  
(Printed)

459-6030  
(Phone Number)

I. Notification, Part A and Core Information

1. Notification filed: \_\_\_\_\_ Date: \_\_\_\_\_
2. Part A application filed: yes Date: August 6, 1982
3. Classified as: Generator ☒ Disposal facility ☒  
Transporter \_\_\_\_\_ Transfer facility \_\_\_\_\_  
Treatment facility \_\_\_\_\_ Recycler \_\_\_\_\_  
Storage facility ☒ Other \_\_\_\_\_

Comments: Scott will amend their Part A Application stating they  
are currently only a generator and a storage facility. Disposal  
is not taking place see attached memo.



4. Have any changes in Notification or Part A been filed? There will shortly Date(s): \_\_\_\_\_
5. Does facility generate a solid waste(s), as defined by WAC 173-303-040? yes
6. Is this waste(s) designated under WAC 173-303, and not RCRA? yes
7. Under what section, in WAC 173-303, are waste(s) designated?
- a. Discarded Chemical Products (081) ✓
  - b. Dangerous Waste Sources (082) ✓
  - c. Dangerous Waste Mixtures (084) \_\_\_\_\_
  - d. Toxic Dangerous Wastes (101) ✓
  - e. Persistent Dangerous Wastes (102) \_\_\_\_\_
  - f. Carcinogenic Dangerous Wastes (103) \_\_\_\_\_
  - g. Dangerous Waste Characteristics (090)
    - (1) Ignitability \_\_\_\_\_
    - (2) Corrosivity \_\_\_\_\_
    - (3) Reactivity \_\_\_\_\_
    - (4) EP Toxicity \_\_\_\_\_

Remarks: Facility is amending Part A Application showing changes in waste designations. Amended application will have wastes as noted below

8. Dangerous Wastes listed on Part A application, or for generators, dangerous wastes generated.

	<u>D.W. No.</u>	<u>Amount</u>	<u>Waste Description</u>	<u>Disposal Method</u>
a.	<u>U151</u>	<u>185 lbs</u>	<u>Mercuro chloride</u>	<u>Acclington</u>
b.	<u>U228</u>	<u>220 gals</u>	<u>Trichloroethylene</u>	<u>recycle or Acclington</u>
c.	<u>EC01</u>	<u>7400 lbs</u>	<u>Solvent-Brulox</u>	<u>Hug fuel or Acclington</u>
d.	<u>EC03</u>	<u>7400 lbs</u>	<u>solvents</u>	<u>Hug fuel or Acclington</u>
e.	<u>EC05</u>	<u>7400 lbs</u>	<u>solvents</u>	<u>Hug fuel or Acclington</u>
f.	<u>WT01</u>	<u>4,800 lbs</u>	<u>Green Formaldehyde Sludge</u>	<u>Acclington or Recycle</u>
g.	_____	_____	_____	_____